

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

ISAAC HAYES ENTERPRISES, LLC, a
Georgia Domestic Limited Liability Company,
and **ISAAC HAYES, III**, as representative of
THE ESTATE OF ISAAC HAYES,

Plaintiffs,

v.

DONALD J. TRUMP, individually, **DONALD J.
TRUMP FOR PRESIDENT 2024, INC.**,
TURNING POINT ACTION, INC., and **BTC,
INC.**,

Defendants.

Civil Action No. 3:25-cv-00388

Judge Aleta A. Trauger

MOTION FOR WITHDRAWAL OF COUNSEL

COMES now, Defendant BTC, Inc. (“BTC”), in accordance with Local Rules 83.01(g) and (h), and respectfully moves this Court for the withdrawal of Matthew P. Warezak of Smith, Gambrell & Russell, LLP as counsel of record for BTC. BTC will continue to be represented by Jeremey R. Goolsby of Frost Brown Todd LLP.

In support of this Motion for Withdrawal of Mr. Warezak as counsel, the undersigned counsel for BTC states as follows:

1. The withdrawal of Mr. Warezak will not cause any delay in this case or otherwise prejudice any party.

2. On April 2, 2025, the Court in a suit pending in the Northern District of Georgia, *Isaac Hayes Enterprises, LLC, et al. v Donald J. Trump, et al.*, Case No. 1:24-cv-03639-TWT (N.D. Ga.) (“Georgia action”), severed all claims asserted against BTC in its Second Amended Complaint and transferred them to this Court. The transfer resulted in the termination of BTC as

a party in the Georgia action on April 2, 2025. (*See* Docs. 131 and 132; *see also* Clerk's Entries, April 2, 2025 and April 7, 2025).

3. In an abundance of caution, counsel for BTC files this motion to ensure that Mr. Warezak is terminated as an attorney of record in the proceedings before *this* Court.

4. As noted above, Jeremy R. Goolsby of Frost Brown Todd LLP will continue to represent BTC.

5. Accordingly, counsel for the undersigned requests that the Court terminate Mr. Warezak as counsel of record in this action.

Dated: July 2, 2025

Respectfully submitted,

/s/ Jeremy R. Goolsby

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CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2025, a true and correct copy of the foregoing was served via electronic delivery upon all parties consenting to electronic service through the Court's CM/ECF system:

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